

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

BEECHER COTTON, PAMELA COLON,
SIRDINA ISAAC-JOSEPH, ESTHER
CLIFFORD, SYLVIA BROWNE, ALVINA
JEAN-MARIE ILARRAZA, RYAN
ALLEYNE, AGNES AUGUSTUS, and
CESARINA MIRANDA, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

LIMETREE BAY VENTURES, LLC,
LIMETREE BAY HOLDINGS, LLC,
LIMETREE BAY REFINING, LLC, LBR
LIQUIDATING TRUST, DAVID M.
DUNN, LIMETREE BAY TERMINALS,
LLC, ARCLIGHT CAPITAL PARTNERS,
LLC, FREEPOINT COMMODITIES, LLC,
EIG GLOBAL ENERGY PARTNERS, LLC,
BP PRODUCTS NORTH AMERICA, INC.,
UNIVERSAL PLANT SERVICES, (VI),
LLC, EXCEL CONSTRUCTION &
MAINTENANCE VI, INC. ELITE
TURNAROUND SPECIALISTS, LTD.,
PINNACLE SERVICES, LLC, VERSA
INTEGRITY GROUP, INC., NATIONAL
INDUSTRIAL SERVICES, LLC and JOHN
DOES 1-100.,

Defendants.

CASE NO. 1:21-CV-00261-WAL-EAH

CLASS ACTION COMPLAINT

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

**RENEWED MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION AGAINST LBR LIQUIDATING TRUST, DAVID DUNN
AND LIMETREE BAY TERMINALS, LLC**

Plaintiffs, individually and on behalf of all others similarly situated as defined in Plaintiffs' operative First Amended Class Action Complaint ("Class Members"), respectfully move this Court for a temporary restraining order and preliminary injunction against LBR Liquidating Trust, David M. Dunn; and Limetree

Cotton, Beecher, et. al. v. Limetree Bay Ventures, LLC, et. al., Case No. 1:21-CV-00261

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Bay Terminals, LLC (d/b/a Ocean Point Terminals) (the “Injunction Defendants”). Plaintiffs have filed their Memorandum of Law in support contemporaneously with this motion.

RESPECTFULLY SUBMITTED
LEE J. ROHN AND ASSOCIATES, LLC
Attorneys for Plaintiffs

DATED: January 25, 2023

BY: /s/ Lee J. Rohn

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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on January 25, 2023, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

All counsel of record